

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

RENEE L. MCCRAY

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Plaintiff

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v.

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Civil Action No. GLR-13-CV1518

WELLS FARGO BANK, N.A. *et al.*

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Defendants

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**SAMUEL I WHITE PC AND SUBSTITUTE TRUSTEES RESPONSE TO PLAINTIFF'S
MOTION FOR LEAVE TO FILE SUR-REPLY**

Comes now Robert H. Hillman and Daniel J. Pesachowitz, attorneys for the Defendants, Samuel I. White, PC ("SIWPC"), John E. Driscoll, II, Robert E. Frazier, Jana M. Gantt, Laura D. Harris, Kimberly Lane, and Deena Reynolds (SIWPC and the individuals collectively hereinafter referred to as "the SIWPC Defendants"), and oppose the Plaintiff's Motion for Leave to File Sur-Reply to the SIWPC Defendant's Motion to Dismiss and for Summary Judgment as follows:

1. The Plaintiff, Renee L. McCray ("McCray"), filed a Motion for Leave to File a Sur-Reply in response to the Reply Memorandum filed by the named Defendants, pertaining to the pending Motions to Dismiss Amended Complaint.

2. McCray has had a full and fair opportunity to oppose the Motions to Dismiss. Even if the Court is inclined to accept the filings, nothing in the Sur-reply affects the pending Motions to Dismiss, and they should be granted.

3. In this regards, clearly no sur-reply is necessary nor appropriate in this instance. Contrary to the assertions in McCray's Motion for Leave, this is not a case where McCray was unable to contest matters presented to the Court for the first time. Rather, a review of McCray's proposed Sur-reply discloses that it is largely a churn out of formerly advanced arguments and references to unrelated lawsuits involving the Defendants, simply to vilify the Defendants.

4. It appears that McCray simply wants to have the last word, regardless of the necessity of additional filings, and without regard to the additional burden being placed on the parties and the Court by such filings.

WHEREFORE, for all the above reasons Samuel I. White, PC, John E. Driscoll, II, Robert E. Frazier, Jana M. Gantt, Laura D. Harris, Kimberly Lane, and Deena Reynolds request that the Court deny McCray's Motion for Leave to File Sur-Reply..

Respectfully Submitted:

Samuel I. White, PC

/s/ Robert H. Hillman
Robert H. Hillman, MD 06910

/s/ Daniel J. Pesachowitz
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P.C. and the SIWPC Individuals

CERTIFICATE OF SERVICE

I hereby certify on this 19th day of September, 2013, that a copy of the foregoing Opposition of Wells Fargo Bank, N.A. and Freddie Mac to McCray's Motion for Leave to file Sur-reply was filed via CM/ECF and served by U.S. Mail, postage prepaid, first class to the following:

Renee L. McCray
109 Edgewood Street
Baltimore, Maryland 21229

/s/ Robert H. Hillman
Robert H. Hillman,